



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

February 12, 2013

Mr. Gary M. Levin  
President and CEO  
Levin Richmond Terminal Corporation  
4012 Wright Avenue  
Richmond, CA 94804

Dear Mr. Levin,

Thank you for informing the United States Environmental Protection Agency (EPA) of your interest in conducting maintenance dredging at Berth B of the Levin Richmond Terminal Corporation. Based on the draft Proposed Scope of Work prepared by Pacific EcoRisk, the work you would like to complete is located in the Lauritzen Channel, which is part of the United Heckathorn Superfund Site. Therefore, EPA's primary requirement is that your work neither interferes with EPA's ongoing feasibility study and future remedy for the site, nor spreads contamination from the site to adjacent waterways.

Because your proposed work is a maintenance dredging project and not a Superfund project, the Dredged Materials Management Office (DMMO) agencies will be the permitting authorities. Therefore, EPA requests that you develop and submit a Sampling and Analysis Plan (SAP) to the DMMO as would normally be required for this type of project. In this case, because of the location of the project, EPA also requests the opportunity to review and approve the Dredge Operations Plan (DOP) you will prepare for the DMMO agencies prior to commencing work. Please send Superfund a copy of any documents that you submit to the DMMO. For your reference as you prepare the SAP and DOP, EPA has the following initial comments:

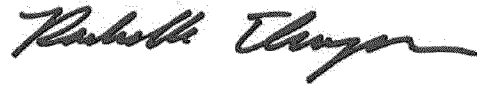
1. EPA recommends z-layer sampling as follows: at each core location, collect and separately archive a 6-inch "z-layer" sample from below the total proposed dredging depth (project depth plus overdepth). Specifically, dredging is proposed for -33 ft MLLW, + 1 additional foot of overdepth, for a total dredge depth of -34 ft MLLW. Thus, the cores should be taken 6 inches deeper, to -34.5 ft MLLW. The lower 6 inches should be separated from each core before the rest of the core is homogenized or composited with sediments from any other cores for testing. These samples can then be used if needed to characterize DDT, dieldrin, and other contaminants determined by the DMMO in the likely post-dredge surface, in comparison to the overlying sediment. Depending on overlying sediment chemistry results, it may become necessary to spatially characterize contaminants other than DDT and dieldrin in the z-layer. As currently proposed in the

draft Scope of Work, other contaminants would only be evaluated in the single berth-wide composite, so spatial characterization would not be possible.

2. EPA recommends evaluating PCB congeners, as well as DDT and dieldrin, on the individual cores. The DMMO will likely ask for the Regional Monitoring Program list of 40 congeners for comparison with San Francisco Estuary Institute's multi-year Bay-wide database, and to be consistent with the Bay's Total Maximum Daily Load for PCBs.
3. The proposal mentions a silt curtain as a potential mitigation measure only. Given the known pesticide contamination at the site, EPA will require the use of a silt curtain during any dredging activities in the Lauritzen Channel. At a minimum, the procedures employed during the previous dredging in 1996-1997 should be used. The DOP should discuss the size, type, location, and operation of the silt curtain very specifically.
4. Another key issue is the proposed use of an environmental bucket for the dredging. Specific requirements for configuration and operation are necessary for a CableArm or similar bucket to actually minimize sediment resuspension and transport, and local turbidity. For example, sealed vents reduce sediment fall-back as the bucket is raised through the water column. Additionally, slower bucket drop and retrieval speeds than are used in typical dredging are usually required. The proposal to allow free water to flow from the bucket back into the water is counter to this concept. It also appears internally inconsistent, because free water in the scows is proposed to be pumped to Baker tanks and subsequently treated.
5. Dewatering cell(s) should be described in more detail. Avoiding leakage from rail cars after dewatering is mentioned, but not containing any water from the dewatering cell(s). At a minimum, the DOP should note whether there would be any physical containment features for any remaining free water such as plastic sheeting over the K-Rails. Again, any lessons learned from similar dewatering operations at this same location should at least be mentioned.
6. EPA recently completed a bathymetric survey of the entire Lauritzen Channel, including the area near Berth B, to support a feasibility study. Since the proposed dredging would clearly modify the surface of the channel sediments, EPA will require that the Levin Richmond Terminal Corporation conduct new side-scan sonar and multi-beam surveys of the Lauritzen Channel soon after the dredging is finished. This may suffice for the DMMO agencies' post-dredge survey needs as well, if coordinated with them in advance.

For questions about the Superfund Site, please contact me at 415-972-3962. For questions about EPA's dredging requirements, please contact Melissa Scianni or Brian Ross of EPA's Water Division at 415-972-3821 or 415-972-3475, respectively. For legal questions, please contact John Lyons of EPA's Office of Regional Counsel at 415-972-3889. Thank you for your ongoing cooperation with the cleanup of the United Heckathorn site.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachelle Thompson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rachelle Thompson, MS, PE  
Remedial Project Manager  
Superfund Division, SFD-7-3

cc: John Lyons, USEPA Office of Regional Counsel  
Melissa Scianni, USEPA Water Division  
Brian Ross, USEPA Water Division